

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Suits Against the Saint Thomas Entities

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**THE SAINT THOMAS ENTITIES’
MOTION TO AMEND THE SCHEDULE FOR CASE-SPECIFIC DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 16 and 26, the Saint Thomas Entities¹ hereby move to amend the current schedule for case-specific discovery. The Saint Thomas Entities request that the Court enter the following schedule; the reasons supporting this Motion are set forth in the Memorandum of Law, filed herewith.

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|--|-------------------|
| Deadline for Written Discovery: | January 29, 2016 |
| Completion of Plaintiffs’ Depositions: | February 19, 2016 |
| Deadline for Execution of Bellwether Strikes and Joint Filing of Summary of Remaining Cases: | February 23, 2016 |
| Plaintiffs’ Expert Reports Due: | March 8, 2016 |
| Deadline to seek leave to move for summary judgment | March 8, 2016 |
| Deadline to file oppositions to motions for leave | March 15, 2016 |
| Defendants’ Expert Reports Due: | April 8, 2016 |
| <i>Daubert</i> Motions Due: | April 22, 2016 |

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

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| Oppositions to <i>Daubert</i> Motions Due: | May 13, 2016 |
| Close of Case-Specific Fact and Expert Discovery: | May 13, 2016 |

Dated: November 23, 2015

SAINT THOMAS WEST HOSPITAL, SAINT
THOMAS HEALTH, and SAINT THOMAS
NETWORK

By their attorneys,

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CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 23rd day of November, 2015.

/s/ Sarah P. Kelly
Sarah P. Kelly

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